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Attorneys for Defendants Temujin Labs Inc.
(Delaware), Temujin Labs Inc. (Cayman), and the
Individual Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

ARIEL ABITTAN,

Plaintiff,

v.

LILY CHAO (A/K/A TIFFANY CHEN, A/K/A
YUTING CHEN), DAMIEN DING (A/K/A
DAMIEN LEUNG, A/K/A TAO DING),
TEMUJIN LABS INC. (A DELAWARE
CORPORATION), AND TEMUJIN LABS INC.
(A CAYMAN CORPORATION)

Defendants,

and

ELIAN LABS INC.,

Nominal Defendant.

Case No.: 5:20-cv-09340

DECLARATION OF YUTING CHEN

Judge: Hon. Nathanael M. Cousins

I, Yuting Chen, hereby state and declare as follows:

1. I have personal knowledge of the matters set forth in
this declaration and, if called upon to do so, could and would

testify competently as to the matters described below.

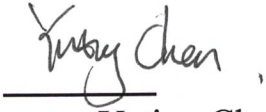
2. I am aware that plaintiff Ariel Abittan has submitted a declaration in this matter in which he makes allegations about an individual who he claims is Lily Chao, and that in this case, he appears to confuse me with Lily Chao.

3. I am not Lily Chao and Lily Chao is not my sister.

4. I have occasionally stayed at the property at 69 Isabella Avenue in Atherton prior to this year, and act as an informal manager of the property, but no one has lived there in 2021. I have a housekeeping company come in to clean the property, but the housekeepers do not live there.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of July, 2021 at Palo Alto, California.

By: 
Yuting Chen

DECL. OF Y. CHEN

Case No. 5:20-cv-09340-NC